

1 AARON D. FORD  
Attorney General  
2 ROBERT W. DELONG, Bar No. 10022  
Deputy Attorney General  
3 State of Nevada  
Bureau of Litigation  
4 Public Safety Division  
100 N. Carson Street  
5 Carson City, Nevada 89701-4717  
Tel: (775) 684-1120  
6 E-mail: rdelong@ag.nv.gov

7 *Attorneys for Defendants*  
*Kelly Belanger, David Bequette,*  
8 *David Carpenter, Christopher Cartier,*  
*Dwayne Deal, Michelle Gilder,*  
9 *Robert LeGrand, Valaree Olivas*  
*Charles Schardin, Adam Vallaster,*  
10 *Michael Ward, and John Whiting*

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 JEREMY JOSEPH STROHMEYER,  
14 Plaintiff,

15 v.

16 K. BELANGER, et al.,  
17 Defendants

Case No. 3:14-cv-00661-RCJ-WGC

**ORDER GRANTING  
MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF'S REQUESTS  
FOR THE PRODUCTION OF DOCUMENTS  
SUBMITTED TO DAVID CARPENTER,  
CHRISTOPHER CARTIER, AND  
DAVID BEQUETTE (First Request)**

19 Defendants, Kelly Belanger, David Bequette, David Carpenter, Christopher Cartier, Dwayne  
20 Deal, Michelle Gilder, Robert LeGrand, Valaree Olivas, Charles Schardin, Adam Vallaster, Michael  
21 Ward, and John Whiting ("Defendants"), by and through counsel, Aaron D. Ford, Attorney General of  
22 the State of Nevada, and Robert W. DeLong, Deputy Attorney General, hereby move to extend the  
23 deadline to respond to Plaintiff's discovery requests submitted to David Carpenter, Christopher Cartier,  
24 and David Bequette. This motion is made and based upon the following memorandum of points and  
25 authorities and all of the pleadings and papers on file herein.

26 **MEMORANDUM OF POINTS AND AUTHORITIES**

27 This Court entered an Order on February 15, 2019 (ECF No. 119), wherein the Court stayed the  
28 discovery and dispositive motion deadlines set forth in this Court's Scheduling Order (ECF No. 81)

1 until further order of the Court. The Order (ECF No. 119) also granted Plaintiff's motion to file a third  
2 amended complaint and indicated that the third amended complaint would need to be screened.

3 The requests for the production of documents submitted by Plaintiff to David Carpenter,  
4 Christopher Cartier, and David Bequette are presently due today, March 18, 2019. Defendants request an  
5 extension of time to respond to the requests for the production of documents submitted to David  
6 Carpenter, Christopher Cartier, and David Bequette because of the length of the requests and the fact that  
7 there is no present discovery cutoff deadline in this case. Each set of discovery contains over 50  
8 requests. Defendants respectfully request an additional 60 days to respond to the requests. The new  
9 deadline to respond to the requests would be Monday, May 20, 2019.

10 This is Defendants' first request for an extension of time to respond to Plaintiff's lengthy  
11 requests for production of documents for these defendants. Pursuant to Fed. R. Civ. P. 6(b)(1)(A),  
12 Defendants request this extension to allow time to properly respond to each of the requests. Defendants  
13 assert that good cause exists for this Court to enlarge the time allowed for them to respond.

14 This request is made in good faith and not for the purpose of delay. The Defendants respectfully  
15 submit that none of the parties will be prejudiced by the extension of time sought.

16 DATED this 18th day of March, 2019.

17 AARON D. FORD  
18 Attorney General

19 By:



20 ROBERT W. DELONG  
21 Deputy Attorney General  
22 State of Nevada  
23 Bureau of Litigation  
24 Public Safety Division

*Attorneys for Defendants*

24 IT IS SO ORDERED.

25 DATED: March 19, 2019.

26   
27 UNITED STATES MAGISTRATE JUDGE  
28